

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JERRY DOMBROWSKI,

Defendant.

:

INDICTMENT

2CD

:

07 Cr.

:

07 CRIM. 600

COUNT ONE

The Grand Jury charges:

1. In or about May 2007, in the Southern District of New York and elsewhere, JERRY DOMBROWSKI, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JERRY DOMBROWSKI, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly would and did distribute, and possess with intent to distribute, a controlled substance, to wit, marihuana, in violation of Title 21, United States Code, Sections 812, 841(a) and 841(b)(1)(D).

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York:

a. On or about May 4, 2007, JERRY DOMBROWSKI, the defendant, and others known and unknown attempted to rob a stash apartment in the Bronx containing marihuana.

(Title 21, United States Code, Section 846.)

**COUNT TWO**

The Grand Jury further charges:

4. In or about May 2007, in the Southern District of New York and elsewhere, JERRY DOMBROWSKI, the defendant, unlawfully, intentionally, and knowingly did attempt to possess with intent to distribute a controlled substance, to wit, marihuana, in violation of Title 21, United States Code, Sections 812, 841(a) and 841(b)(1)(D).

(Title 21, United States Code, Section 846;  
Title 18, United States Code, Section 2.)

**COUNT THREE**

The Grand Jury further charges:

5. In or about May 2007, in the Southern District of New York and elsewhere, JERRY DOMBROWSKI, the defendant, and others known and unknown, unlawfully, willfully and knowingly combined, conspired, confederated and agreed together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), to wit, a robbery of narcotics and narcotics proceeds from drug traffickers, and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that

term is defined in Title 18, United States Code, Section 1951(b)(3).

(Title 18, United States Code, Section 1951.)

**COUNT FOUR**

The Grand Jury further charges:

6. In or about May 2007, in the Southern District of New York and elsewhere, JERRY DOMBROWSKI, the defendant, unlawfully, willfully and knowingly did commit and attempt to commit a robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), to wit, a robbery of narcotics and narcotics proceeds from drug traffickers, and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

(Title 18, United States Code, Sections 1951 and 2.)

**COUNT FIVE**

The Grand Jury further charges:

7. In or about May 2007, in the Southern District of New York and elsewhere, JERRY DOMBROWSKI, the defendant, unlawfully, willfully and knowingly used and carried a firearm, and aided and abetted the use and carrying of a firearm, during and in relation to a crime of violence and drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, the crimes charged in Counts One, Two, Three, and Four, and possessed, and aided and abetted the possession of, a firearm

in furtherance of said crimes, during which a firearm was brandished.

(Title 18, United States Code,  
Sections 924(c)(1)(A)(i) and (ii), and 2.)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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**INDICTMENT**

O7 Cr.


(Title 18, United States Code,  
Sections 924(c)(1)(A)(i) and (ii), and 2.)

BENJAMIN GRUENSTEIN  
212-637-2315

MICHAEL J. GARCIA  
United States Attorney

**A TRUE BILL**

Post 11/87

  
Foreperson.

RC  
7/2/07

Indictment filed, case assigned to Judge  
Scheindlin, arrest warrant issued

F. Macos, USMJ